

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 RYAN W. DANIELS
Nevada Bar No. 13094
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 rdaniels@kcnvlaw.com

7 *Attorneys for Defendants*
Las Vegas Metropolitan Police Department,
8 *Captain Nita Schmidt and Officer Hugh Hardy*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 TERRELL DESHON KEMP, SR.,

12 Plaintiff,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; et al.,

15 Defendants.

CASE NO.: 2:18-cv-00169-RFB-BNW

**STIPULATION TO EXTEND TIME
TO FILE REPLY IN SUPPORT OF
THE LVMPD DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT
[ECF Nos. 85, 86]**

(First Request)

17 Plaintiff Terrell Deshon Kemp, Sr., ("Plaintiff"), by and through his counsel, Trevor J.
18 Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro bono publico*, and
19 Defendants Las Vegas Metropolitan Police Department ("LVMPD"), Captain Nita Schmidt, and
20 Officer Hugh Hardy (hereinafter "LVMPD Defendants"), by and through their counsel, Lyssa S.
21 Anderson, Esq., of the law firm of Kaempfer Crowell, hereby stipulate and agree to extend the
22 time for LVMPD to Reply in Support of its Motion for Summary Judgment (ECF No. 86), and
23 for Defendants Hardy and Schmidt to Reply in Support of their Motion for Summary Judgment
24 (ECF No. 85).

1 This request for an extension is made due to the issues addressed in the opposition, the
 2 number of Replies to Motions for Summary Judgment due on the same date and Defendants'
 3 counsels' request to accommodate conflicting scheduling. This request is made by consent of all
 4 parties, is made in good faith, and not for the purpose of delay.

5 Accordingly, the LVMPD Defendants shall have up to and including January 7, 2022, to
 6 Reply in support of their respective Motions for Summary Judgment (ECF Nos. 85 and 86).

7 DATED this 1st day of November, 2021.

8 KAEMPFER CROWELL

HATFIELD & ASSOCIATES, LTD.

9 By: /s/ Lyssa S. Anderson


By: /s/ Trevor J. Hatfield

10 Lyssa S. Anderson (NV Bar # 5781)
 11 Ryan W. Daniels (NV Bar # 13094)
 1980 Festival Plaza Dr. Ste. 650
 Las Vegas, Nevada 89135
Attorneys for Defendants
Las Vegas Metropolitan Police
Department, Captain Nita Schmidt
and Officer Hugh Hardy

Trevor J. Hatfield (NV Bar # 7373)
 703 S. 8th Street
 Las Vegas, NV 89101
Attorneys for Plaintiff
Terrell Deshon Kemp, Sr.

14 **ORDER**

15 **IT IS SO ORDERED:**

16 
 17 **RICHARD E. BOULWARE, II**
 18 **United States District Court**

19 Signed November 3, 2021

Luisa Cota

From: Trevor Hatfield <thatfield@hatfieldlawassociates.com>
Sent: Monday, November 1, 2021 4:00 PM
To: Ryan Daniels
Cc: Lyssa Anderson; Freda Brazier; Kristopher Kalkowski; Bonnie Jacobs; Luisa Cota
Subject: Re: Kemp v. LVMPD, et al

That's fine, you may e-sign it for me.

Trevor J. Hatfield, Esq.,
HATFIELD & ASSOCIATES, LTD.
703 S. Eighth St.
Las Vegas, NV 89101
(702) 388-4469



thatfield@hatfieldlawassociates.com

This e-mail communication is a confidential attorney communication intended only for the person to whom it is addressed above. Any dissemination, distribution, or copying of this communication is strictly prohibited.

IRS Circular 230 Notice: To ensure compliance with requirements imposed by the IRS, you are hereby informed that any federal tax advice contained in this communication is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

On Mon, Nov 1, 2021 at 3:49 PM Ryan Daniels <RDaniels@kcnvlaw.com> wrote:

Hello Trevor,

Here is a SAO. Let us know if we may use your electronic signature.

We made the extension based off the deadline to respond (11/9/21). I incorrectly thought the deadline was tomorrow. Thanks.